

Somers Music Patrons Somers High Schools Name of the Schools of th

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10/11/2017

Chairman Ajit Pai Commissioner Mignon Clyburn Commissioner Michael O'Rielly Commissioner Brendan Carr Commissioner Jessica Rosenworcel c/o Marlene H. Dortch, Secretary

Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of the Somers school system, located in Somers, Connecticut, that provides approximately 20 performances per year to 4000 audience members and education programs to 600 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

We are a group of volunteers that provide support to the Music Programs in the Somers School system from elementary through high school. Our volunteers also support the theater and other programs at the middle and high school. Our programs are open to all students, including those with special needs.

I strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

School theatre programs and professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while limiting significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to educational theatre, both in the training and safety of students, onstage and backstage.

The following is our response to questions related to our equipment that we use:

- What type of wireless devices do we use?
 - o 20 set of wireless lapel mics
 - o 14 Sets of wireless handheld mics

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- o 2 Sets of instrument (guitar) transmitters
- o Wireless lighting controller (not transmitting sound)
- How many units do you use in a typical presentation or performance?
 - o 20 Lapel plus 2 handheld for theatre productions
 - o 8 Handheld, 2 lapel and 1 instrument for concerts
- How frequently do you offer presentations that use wireless devices? Average 3 times / month
- What bands and channels do you use?
 - Low UHF (channels 14–36, 470 to 608 MHz)
 - High UHF (channels 38–51, the 600 MHz band, 614 MHz to 698 MHz)
 - o Are your microphones able to tune to more than one frequency?
 - All the mics can be tuned within a frequency range
- Which of your wireless devices are analog, and which are digital?
 - o 12 handheld plus 2 instrument are analog
 - o 20 Lapel plus 2 handheld are digital
- Do you own or rent your wireless equipment? We own all our equipment
- For equipment that you own, what is its reasonable life expectancy? 20 years
- How did you handle the move out of the 700 MHz band in 2010?
 - o How much did it cost: \$14,000
 - o How long did it take for you to retune or replace all your devices? We did not have the funds to replace our equipment until 2016
- If you have an experienced audio technician on staff or as a contractor, please describe his or her education and experience, including any professional associations and certifications.
 - O We have no audio professional on staff. We have a parent volunteer with an engineering background that manages the equipment. We also have a audio professional from the Bushnell in Hartford, CT that has come in to provide training and guidance.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

We appreciate that the Commission has sought Public Comment on this very important issue. Educational institutions and professional performing arts organizations should have access to reliably available spectrum with interference protection. I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. It took us many years to come up with the funding to replace our 700MHZ systems. We are concerned about the cost of once again replacing my school's 600 band sound equipment since it takes us years of fundraising to get the money required for these expensive wireless systems. The systems we have are used in all programs at our school including theater programs, concerts, talent shows, school presentations, emergency response drills, anti drug programs, public meetings and much more.

The wireless systems are an important teaching aid and we are very dependent on the equipment and eliminating another frequency band will have a significant negative impact on our school. Any relief you can provide will be very helpful to us.

Sincerely,

Bob Hall

President

Somers Music Patrons

Somers, Connecticut

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